

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STEVEN G. MILLETT, MELODY G. MILLETT,)
On Behalf Of Themselves and All Others)
Similarly Situated,)
Plaintiffs,)
v.) Case No. 05-599-SLR
TRUELINK, INC.,)
A TransUnion Company,)
Defendant.)

UNOPPOSED MOTION FOR COURT ORDER

Plaintiffs Steven and Melody Millett, by and through counsel of record, move this Honorable Court for an Order directing Defendant, a wholly owned subsidiary of TransUnion, LLC, to provide the Plaintiffs with the following information from the credit file in TransUnion's database(s) of Abundio Cuautle Perez (including any known aliases) with a Social Security number that is the same as Steven Millett's Social Security number, including:

- 1) the name and address of each entity identified on the credit file as the credit grantor for an account listed on the credit file;
- 2) the account number of each such account listed on the file; and
- 3) the name and address of each entity identified on the credit file as having requested the credit file.

In support thereof, Plaintiffs state as follows:

1. Defendant does not oppose the motion or the order.

2. Plaintiffs require this information in order to close any credit files, suppressed or reported, which are or were fraudulently opened or reported utilizing the Social Security number issued to Plaintiff Steven G. Millett ("Steven Millett").
3. Plaintiff Steven G. Millett was issued a Social Security number by the Social Security Administration.
4. Plaintiff Steven G. Millett previously filed, for inspection in camera by the Court, an affidavit which sets out his Social Security number and provides a form of identification and photographic identification (hereinafter "Affidavit"). This information was provided to the Court for in camera review in order to protect the private information of Steven Millett pursuant to the Federal Rules of Civil Procedure and local rules. D.I. 121.
5. Mr. Millett is the known victim of identity theft. See Steven G. Millett Affidavit. D.I. 121. The information about the known use of his Social Security number is necessary so that all accounts opened with his personal identification information can be closed.

This Court has authority to enter such an Order pursuant to 15 U.S.C. 1681a and 15 U.S.C. 1681b. See also In re Grand Jury Proceedings, 503 F.Supp. 9, 12 (D.C.N.J., 1980). "The production of credit reports pursuant to court order was obviously listed as permitted conduct because such material may be relevant evidence in all manner of court proceedings. Congress had no intention to invade the judicial sphere. It is of some significance that the other permitted uses listed by s 1681b are all related to the normal and ordinary uses for which credit reports are prepared. The judicial use may be for entirely different purposes, and more likely is for different purposes." Id.

Wherefore, Plaintiffs request an Order from the Court directing Defendant, by and through TranUnion, LLC, its parent company, to provide the information set forth in this Motion.

Respectfully submitted,
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